

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, Both  
individually and as Legal Guardian of  
Shane Allen Loveland; and JACOB  
SUMMERS

CASE NO. 8:18CV127

Plaintiff(s),

v.

THE GOODYEAR TIRE & RUBBER  
COMPANY

Defendant(s).

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**DECLARATION OF KYLE WAYNE FARRAR IN SUPPORT PLAINTIFFS' BRIEF IN  
OPPOSITION TO DEFENDANT'S MOTION IN LIMINE SEEKING EXCLUSION OF  
ALL REFERENCES TO ANY SORT OF "PRIVATE" RECALL OF TIRES OR OTHER  
EVIDENCE REGARDING AN ALLEGED POST-SALE DUTY TO RECALL**

I, Kyle Wayne Farrar, declare as follows:

My name is Kyle Wayne Farrar. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts state herein are true and correct.

True and accurate copies of each of the documents identified as Exhibits in Plaintiffs' Brief in Opposition to Goodyear's Motion in Limine Seeking Exclusion of all References to Any Sort of "Private" Recall of Tires or Other Evidence Regarding an Alleged Post-Sale Duty to Recall are attached to the Index in Support of Plaintiffs' Brief in Opposition to Goodyear's Motion in Limine Seeking Exclusion of all References to Any Sort of "Private" Recall of Tires or Other Evidence Regarding an Alleged Post-Sale Duty to Recall.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this February 11, 2020 in Houston, Texas.

By:   
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Kyle Wayne Farrar